

REMARKS

Claims 1-20 are pending in this application. By this Amendment, claims 6, 7, 12, 14 and 19 are amended.

On page 2, the Office Action objects to Figure 13 because it lacks a legend such as "Prior Art". It is submitted that, although that which is shown in Figure 13 is described as "conventional" on page 1 of the application, there is no admission that Figure 13 portrays "prior art" under 35 U.S.C. §102. In other words, Applicant is unaware of any embodiment of that which is "conventional" being published, on sale, or publicly used in a manner that would constitute prior art pursuant to 35 U.S.C. § 102. Applicant cannot therefore, represent that the "conventional" technology qualifies as prior art.

On page 2, the Office Action objects to the disclosure. More specifically, the Office Action suggests a change for page 17, line 10 of the Application. The specification is amended as suggested in the Office Action. Therefore, it is respectfully requested that the objection to the disclosure be withdrawn.

On page 2, the Office Action objects to claims 6, 7 and 14-20 for specified informalities. Claims 6, 7 and 14 are amended consistent with the recommendations with the Office Action. Claims 12 and 19 are amended in a comparable manner. Therefore, it is respectfully requested that the objection to the claims be withdrawn.

Although the claims are amended in a manner consistent with the suggestions made within the Office Action, these amendments are not intended to serve as an acquiescence to representations made in the Office Action regarding what is shown in the specification and drawings. More particularly, near the end of page 3, the Office Action states that the specification and drawings, "only show an IC with a built-in processor also coupled to a built-in memory." In support of this representation regarding that which is shown in the

specification and drawings, the Office Action cites Application Figures 10-12. However, the Office Action fails to acknowledge that which is shown in figures 1, 3, 5, and 7-9, where other embodiments are depicted. The representations made in the Office Action regarding that which is shown by the specification and drawings to not apply to all embodiments disclosed in the application, if any. Thus, the Office Action inaccurately represents what is shown in the specification and drawings.

On page 4, the Office Action rejects claims 1, 2, 5 and 7 under 35 U.S.C. §102(a) as being anticipated by Applicant's admitted prior art (AAPA). This rejection is respectfully traversed.

As previously stated with the respect to the objection to Fig. 13, although that which is shown in Fig. 13 is described as being "conventional" on page 1 of the Application, there is no admission that any disclosure in the Application is "prior art" under 35 U.S.C. §102. Applicant is unaware of any embodiment of that which is described in the Application as being "conventional", that was published, on sale, or publicly used in a manner that would constitute prior art pursuant to 35 U.S.C. § 102. Therefore, since no concession has been made of any disclosure being statutory prior art, it is respectfully asserted that the Examiner has improperly relied on the disclosure of the Application as prior art in the rejection.

Further regarding Claim 1, assuming *arguendo* that a concession has been made that the application discloses admitted prior art, which it does not, the claim recites, "an information generation circuit" and "a write circuit". These recitations constitute two discrete elements of claim 1. In relying on that which is shown in Fig. 13 of the application in rejecting the claim, the Office Action relies on a single element, the ID generation circuit 101. Thus, the Office Action improperly relies on a single element as anticipatory of two discrete claimed elements.

Further regarding claim 2, assuming *arguendo* that the application discloses admitted prior art, which it does not, the Office Action cites page 2, line 7-9, of the application as anticipatory of claim 2. It is respectfully submitted that this reliance on the application is improper. The portion of the application cited by the Office Action describes a deficiency in the conventional art that is overcome by the invention. This description of a deficiency in the conventional art is in no way a concession of that which is present in the conventional art. The Office Action improperly makes it such a concession.

Claims 5 and 7 are allowable based at least on their dependency from claim 1.

For at least the foregoing reasons, it is respectfully requested that the rejection of claims 1, 2, 5 and 7 under 35 U.S.C. §102(a) as being anticipated by AAPA be withdrawn.

On page 5, the Office Action rejects claim 3 under 35 U.S.C. §103(a) as being unpatentable over AAPA and Ogura (U.S. Patent No. 6,181,629). This rejection is respectfully traversed.

Claim 3 is allowable based on its dependency from claim 1 for at least the reasons stated above in connection with the rejection of claim 1.

Further regarding claim 3, the claim recites that, "the write circuit writes the information into the memory when a command from the processor ends." The Office Action correctly concedes that the application does not admit as prior art anything containing this limitation. In order to overcome this admitted deficiency, the Office Action relies on Ogura.

Specifically, the Office Action cites col. 3, lines 61-63, of Ogura and asserts that Ogura teaches a semiconductor memory device that includes a reset signal under the direction of the CPU. However, Ogura neither teaches, discloses, nor suggests anything further regarding the reset signal RSTE. Ogura does not contain a timing chart or any other description connecting the reset signal RSTE to any specific timing. Thus, Ogura neither

discloses, teaches nor suggests anything associated with a time, "when a command from the processor ends" as recited in claim 3.

Still further, the teaching of Ogura cited by the Office Action exists almost in a vacuum. There is no teaching or suggestion whatsoever to combine this isolated teaching of Ogura with any other teaching to arrive at the combination as claimed in claim 3. Further, even assuming *arguendo* that such a teaching or suggestion existed, which it does not, the Office Action makes no assertion that it exists, nor provides any citation or information as to where such a teaching or suggestion can be found to combine the isolated teaching of Ogura relied upon with anything else to arrive at the combination as claimed in claim 3.

For at least the foregoing reasons, it is respectfully asserted that Ogura, in combination with AAPA, even assuming *arguendo* that the application admits prior art, which it does not, fails to disclose, teach or suggest the combination as claimed in claim 3. Therefore, it is respectfully requested that this rejection of claim 3 be withdrawn.

On page 6, the Office Action rejects claim 6 under 35 U.S.C. §103(a) as being unpatentable over AAPA and Runaldue et al. (U.S. Patent No. 6,178,483) (hereinafter "Runaldue"). The rejection is respectfully traversed.

Claim 6 is allowable based at least on its dependency from claim 1 for the reasons stated above in connection with the rejection of claim 1.

Further regarding claim 6, the claim recites, "a register which receives address data of the area where the information is written . . . " (emphasis added). The Office Action correctly concedes that the application does not admit prior art disclosing this limitation of claim 6. In order to overcome this correctly admitted deficiency, the Office Action relies on Runaldue. More specifically, the Office Action cites col. 11, lines 15-21 of Runaldue. However, the address disclosed in Runaldue is an address, "at which the data is to be stored . . ." (col. 11, line 17) (emphasis added). Thus, the disclosure of Runaldue relied upon by the Office Action

pertains to an address at which data is to be stored at some time in the future. In contradistinction, claim 6 relates to a register which receives address data of the area where the information has already been written at some time in the past.

For at least the foregoing reason, even assuming *arguendo* that the application contains admitted prior art as asserted in the Office Action, which it does not, the reliance on Runaldue fails to overcome the admitted deficiencies, and the combination of AAPA and Runaldue fails to disclose, teach or suggest the combination as claimed in claim 6.

For at least the foregoing reasons, it is respectfully requested that the rejection of claim 6 under 35 U.S.C. §103(a) as being unpatentable over AAPA and Runaldue be withdrawn.

On page 6, the Office Action rejects claims 8, 9 and 13 under 35 U.S.C. §103(a) as being unpatentable over AAPA and Handy ("The Cache Memory Book", p. 89-90). This rejection is respectfully traversed.

As previously stated with the respect to the objection to Fig. 13, although that which is shown in Fig. 13 is described as being "conventional" on page 1 of the Application, there is no admission that any disclosure in the Application is "prior art" under 35 U.S.C. §102. Applicant is unaware of any embodiment of that which is described in the Application as being "conventional", that was published, on sale, or publicly used in a manner that would constitute prior art pursuant to 35 U.S.C. § 102. Therefore, since no concession has been made of any disclosure being statutory prior art, it is respectfully asserted that the Examiner has improperly relied on the disclosure of the Application as prior art in the rejection.

Further regarding Claim 8, assuming *arguendo* that a concession has been made that the application discloses admitted prior art, which it does not, the claim recites, "an information generation circuit" and "a write circuit". These recitations constitute two discrete elements of the claim. In relying on that which is shown in Fig. 13 of the application in

rejecting the claim, the Office Action relies on a single element, the ID generation circuit 101. Thus, the Office Action improperly relies on a single element as anticipatory of two discrete claimed elements.

Further regarding claim 9, assuming *arguendo* that the application discloses admitted prior art, which it does not, the Office Action cites page 2, line 7-9, of the application as anticipatory of claim 9. It is respectfully submitted that this reliance on the application is improper. The portion of the application cited by the Office Action describes a deficiency in the conventional art that is overcome by the invention. This description of a deficiency in the conventional art is in no way a concession of that which is present in the conventional art. The Office Action improperly makes it such a concession.

Claim 13 is allowable based at least on its dependency from claim 8.

For at least the foregoing reasons it is respectfully requested that the rejection of claims 8, 9 and 13 under 35 U.S.C. §103(a) as being unpatentable over AAPA and Handy be withdrawn.

On page 7, the Office Action rejects claim 10 under 35 U.S.C. §103(a) as being unpatentable over AAPA, Handy, and Ogura. This rejection is respectfully traversed.

Claim 10 is allowable based at least on its dependency from claim 8 for the reasons stated above in connection with the rejection of claim 8.

Further regarding claim 10, the claim recites that, "the write circuit writes the information into the memory when a command from the processor ends." The Office Action correctly concedes that the application does not admit as prior art anything containing this limitation. In order to overcome this admitted deficiency, the Office Action relies on Ogura.

Specifically, the Office Action cites col. 3, lines 61-63, of Ogura and asserts that Ogura teaches a semiconductor memory device that includes a reset signal under the direction of the CPU. However, Ogura neither teaches, discloses, nor suggests anything further

regarding the reset signal RSTE. Ogura does not contain a timing chart or any other description connecting the reset signal RSTE to any specific timing. Thus, Ogura neither discloses, teaches nor suggests anything associated with a time, "when a command from the processor ends" as recited in claim 10.

Still further, the teaching of Ogura cited by the Office Action exists almost in a vacuum. There is no teaching or suggestion whatsoever to combine this isolated teaching of Ogura with any other teaching to arrive at the combination as claimed in claim 10. Further, even assuming *arguendo* that such a teaching or suggestion existed, which it does not, the Office Action makes no assertion that it exists, nor provides any citation or information as to where such a teaching or suggestion can be found to combine the isolated teaching of Ogura relied upon with anything else to arrive at the combination as claimed in claim 10.

For at least the foregoing reasons, it is respectfully asserted that Ogura, in combination with AAPA, even assuming *arguendo* that the application admits prior art, which it does not, fails to disclose, teach or suggest the combination as claimed in claim 10.

For at least the foregoing reasons, it is respectfully requested that the rejection of claim 10 under 35 U.S.C. §103(a) as being unpatentable over APPA, Handy, and Ogura, be withdrawn.

On page 8, the Office Action rejects claim 12 under 35 U.S.C. §103(a) as being unpatentable over AAPA, Handy, and Runaldue. This rejection is respectfully traversed.

Claim 12 is allowable based at least on its dependency from claim 1 for the reasons stated above in connection with the rejection of claim 1.

Further regarding claim 12, the claim recites, "a register which receives address data of the area where the information is written . . . " (emphasis added). The Office Action correctly concedes that the application does not admit prior art disclosing this limitation of claim 12. In order to overcome this correctly admitted deficiency, the Office Action relies on

Runaldue. More specifically, the Office Action cites col. 11, lines 15-21 of Runaldue. However, the address disclosed in Runaldue is an address, "at which the data is to be stored . . ." (col. 11, line 17) (emphasis added). Thus, the disclosure of Runaldue relied upon by the Office Action pertains to an address at which data is to be stored at some time in the future. In contradistinction, claim 12 relates to a register which receives address data of the area where the information has already been written at some time in the past.

For at least the foregoing reason, even assuming *arguendo* that the application contains admitted prior art as asserted in the Office Action, which it does not, the reliance on Runaldue fails to overcome the admitted deficiencies, and the combination of AAPA and Runaldue fails to disclose, teach or suggest the combination as claimed in claim 12.

For at least the foregoing reasons, it is respectfully requested that the rejection of claim 12 under 35 U.S.C. §103(a) as being unpatentable over AAPA, Handy, and Runaldue be withdrawn.

On page 8, the Office Action rejects claims 14, 15, 18 and 20 under 35 U.S.C. §103(a) as being unpatentable over AAPA and Ayukawa (U.S. Patent No. 6,381,671) (hereinafter "Ayukawa"). This rejection is respectfully traversed.

As previously stated with the respect to the objection to Fig. 13, although that which is shown in Fig. 13 is described as being "conventional" on page 1 of the Application, there is no admission that any disclosure in the Application is "prior art" under 35 U.S.C. §102. Applicant is unaware of any embodiment of that which is described in the Application as being "conventional", that was published, on sale, or publicly used in a manner that would constitute prior art pursuant to 35 U.S.C. § 102. Therefore, since no concession has been made of any disclosure being statutory prior art, it is respectfully asserted that the Examiner has improperly relied on the disclosure of the Application as prior art in the rejection.

Further regarding Claim 14, assuming *arguendo* that a concession has been made that the application discloses admitted prior art, which it does not, the claim recites, "an information generation circuit" and "a write circuit". These recitations constitute two discrete elements of the claim. In relying on that which is shown in Fig. 13 of the application in rejecting the claim, the Office Action relies on a single element, the ID generation circuit 101. Thus, the Office Action improperly relies on a single element as anticipatory of two discrete claimed elements.

The Office Action correctly concedes that the application does not admit as prior art a semiconductor integrated circuit having a built-in processor. In order to overcome this admitted deficiency, the Office Action relies on Ayukawa. More specifically, the Office Action cites col. 1, lines 13-31 of Ayukawa. Ayukawa teaches a semiconductor integrated circuit including a CPU and a memory within a single chip. However, this teaching of Ayukawa appears to exist almost in a vacuum. There is no teaching or suggestion that the semiconductor integrated circuit, CPU, and memory of Ayukawa be modified in any way or combined with any other teaching to arrive at the combination as claimed in claim 14. Further, even assuming *arguendo* that such a teaching or suggestion existed, which it does not, the Office Action contains no reference to such a teaching or suggestion.

Further regarding claim 15, assuming *arguendo* that the application discloses admitted prior art, which it does not, the Office Action cites page 2, line 7-9, of the application as anticipatory of claim 15. It is respectfully submitted that this reliance on the application is improper. The portion of the application cited by the Office Action describes a deficiency in the conventional art that is overcome by the invention. This description of a deficiency in the conventional art is in no way a concession of that which is present in the conventional art. The Office Action improperly makes it such a concession.

Claims 18 and 20 are allowable based at least on their dependence from claim 14.

For at least the foregoing reasons it is respectfully requested that the rejection of claims 14, 15, 18 and 20 under 35 U.S.C. §103(a) as being unpatentable over AAPA and Ayukawa be withdrawn.

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-20 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff
Registration No. 27,075

Mark R. Woodall
Registration No. 43,286

JAO:MRW/rle

Date: November 12, 2003

OLIFF & BERRIDGE, PLC
P.O. Box 19928
Alexandria, Virginia 22320
Telephone: (703) 836-6400

DEPOSIT ACCOUNT USE AUTHORIZATION Please grant any extension necessary for entry; Charge any fee due to our Deposit Account No. 15-0461
--